



STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY

Northwest Regional Office • 3190 160th Avenue SE • Bellevue, Washington 98008-5452 • (425) 649-7000

March 23, 2009

Ms. (b) (6)
(b) (6)
Snohomish, WA 98296

Dear Ms. (b) (6) :

Re: No Further Action at the following Site:

- **Site Name:** Auto Site Automotive
- **Site Address:** 11803 Des Moines Memorial Drive South, Seattle, WA 98168
- **Facility/Site No.:** 53457146
- **VCP Project No.:** NW2113

The Washington State Department of Ecology (Ecology) received your request for an opinion on your independent cleanup of the Auto Site Automotive (Site). This letter provides our opinion. We are providing this opinion under the authority of the Model Toxics Control Act (MTCA), Chapter 70.105D RCW.

Issue Presented and Opinion

Is further remedial action necessary to clean up contamination at the Site?

NO. Ecology has determined that no further remedial action is necessary to clean up contamination at the Site.

This opinion is based on an analysis of whether the remedial action meets the substantive requirements of MTCA, Chapter 70.105D RCW, and its implementing regulations, Chapter 173-340 WAC (collectively "substantive requirements of MTCA"). The analysis is provided below.

Description of the Site

This opinion applies only to the Site described below. The Site is defined by the nature and extent of contamination associated with the following release:

- Gasoline- and diesel-range organics in the soil.

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An assessment and geophysical survey identified 3 areas within the property that were potentially impacted by past and present automotive service operations. They are:

- heating oil/used oil USTs
- former fuel UST area
- hydraulic joist/sumps/drain in the service bays.

Enclosure A includes a detailed description and diagram of the Site, as currently known to Ecology.

It should be noted that gasoline- and diesel-range hydrocarbon contamination above MTCA Method A cleanup level for soil was not observed in the area of the 2 AST currently in use at the facility and are not included in the Site.

Please note that parcel(s) of real property associated with this Site are also located within the projected boundaries of the Tacoma Smelter Plume facility (# 66948686). At this time, we have no information that those parcel(s) are actually affected. This opinion does not apply to any contamination associated with the Tacoma Smelter Plume facility.

Basis for the Opinion

This opinion is based on the information contained in the following documents:

1. January 14, 2009. Summary Letter, Site Remediation, Former Shell Oil Station, 11803 Des Moines Memorial Drive South, Seattle, WA. Pinnacle GeoSciences.
2. June 27, 2008. Summary Letter, Site Assessment, Former Shell Oil Station, 11803 Des Moines Memorial Drive South, Seattle, WA. Pinnacle GeoSciences.

Those documents are kept in the Central Files of the Northwest Regional Office of Ecology (NWRO) for review by appointment only. You can make an appointment by calling the NWRO resource contact at 425-649-7190.

This opinion is void if any of the information contained in those documents is materially false or misleading.

Analysis of the Cleanup

Ecology has concluded that **no further remedial action** is necessary to clean up contamination at the Site. That conclusion is based on the following analysis:

1. Characterization of the Site.

Ecology has determined your characterization of the Site is sufficient to establish cleanup standards and select a cleanup action. The Site is described above and in **Enclosure A**.

2. Establishment of cleanup standards.

Ecology has determined the cleanup levels and points of compliance you established for the Site meet the substantive requirements of MTCA.

a. Cleanup levels.

Soil

- For protection of direct contact: MTCA Method A for unrestricted land uses. Site is in a commercial business area, and may be developed in the future.
- For protection of ground water: MTCA Method A for unrestricted land uses. Ground water at the Site is not impacted. More than 25' of unimpacted soil separates the deepest extent of observed contaminated soils from the groundwater aquifer at an approximate depth of 40' bgs.
- For protection of terrestrial species: Site excluded per simplified terrestrial ecological evaluation

b. Points of compliance.

Soil

- Standard point of compliance.

3. Selection of cleanup action.

Ecology has determined the cleanup action you selected for the Site meets the substantive requirements of MTCA.

The selected cleanup action was complete removal of soils containing gasoline- and diesel-range hydrocarbons above the established cleanup levels.

4. Cleanup.

Ecology has determined the cleanup you performed meets the cleanup standards established for the Site.

Cleanup actions at the Site involved removal of the heating oil/used oil USTs and removal of soil impacted with gasoline- and diesel-range hydrocarbons associated with these three areas:

- heating oil/used oil USTs
- former fuel UST area
- hydraulic joist/sumps/drain in the service bays.

More detail on the remedial action/cleanup is presented in Enclosure A.

Listing of the Site

Based on this opinion, Ecology will remove the Site from our Confirmed and Suspected Contaminated Sites List and Leaking Underground Storage Tank List.

Limitations of the Opinion

1. Opinion does not settle liability with the state.

Liable persons are strictly liable, jointly and severally, for all remedial action costs and for all natural resource damages resulting from the release or releases of hazardous substances at the Site. This opinion **does not**:

- Resolve or alter a person's liability to the state.
- Protect liable persons from contribution claims by third parties.

To settle liability with the state and obtain protection from contribution claims, a person must enter into a consent decree with Ecology under RCW 70.105D.040(4).

2. Opinion does not constitute a determination of substantial equivalence.

To recover remedial action costs from other liable persons under MTCA, one must demonstrate that the action is the substantial equivalent of an Ecology-conducted or Ecology-supervised action. This opinion does not determine whether the action you performed is substantially equivalent. Courts make that determination. *See* RCW 70.105D.080 and WAC 173-340-545.

3. State is immune from liability.

The state, Ecology, and its officers and employees are immune from all liability, and no cause of action of any nature may arise from any act or omission in providing this opinion. *See* RCW 70.105D.030(1)(i).

Termination of Agreement

Thank you for cleaning up the Site under the Voluntary Cleanup Program (VCP). This opinion terminates the VCP Agreement governing this project (#NW2113).

For more information about the VCP and the cleanup process, please visit our web site: www.ecy.wa.gov/programs/tcp/vcp/vcpmain.htm. If you have any questions about this opinion or the termination of the Agreement, please contact me at 425-649-7242.

Sincerely,



Libby S. Goldstein
NWRO Toxics Cleanup Program

lg/kp

Enclosures (1): A – Description and Diagram of the Site

cc: Mr. Norman Puri, P.E., Pinnacle GeoSciences, Inc.
Ms. Delores Mitchell, VCP Financial Manager (without enclosures)

Enclosure A

Description and Diagram of the Site

Enclosure A – Site Description and Diagram of Site

Site Name: Auto Site Automotive (Site)

Site address: 11803 Des Moines Memorial Drive South, Seattle, WA 98168

Township 23N, Range 4E, Section 9 Quarter-Quarter SW of NW

Cross streets are Des Moines Memorial Drive S and S 118th Street

The site is owned by the (b) (6) Estate.

SITE DESCRIPTION

From 1962 until about 1974, Shell Oil operated a fuel service station with maintenance bays. In 1974, the (b) (6) family purchased the property from Shell. The (b) (6) family did not operate a gasoline service station but did rent the property to several auto repair businesses. The property is currently vacant.

The Service Station is located on 0.48 ac. bounded by Des Moines Memorial Drive South to the east, S. 118 St. to the north, apartments to the west and a vacant commercial property to the south. There are residences along the east side of Des Moines Memorial Drive. A map of the Property and approximate boundaries of the Site is attached.

The average elevation of the property is approximately 290 feet with respect to the National Vertical Datum of 1929. The property slopes downward to the north and is completely covered with a building or asphalt except for a small strip on the west side of the building. Surface water drainage at the property flows to a catch basin on the south side of South 118th Street right of way.

The property is underlain by approximately 3 – 10 feet of soft or stiff silt with varying amounts of sand and gravel, underlain in turn by glacially consolidated very stiff to hard silt with varying amounts of sand and gravel. Soil near the south uphill portion of the property appeared to be glacially consolidated very stiff to hard silt at shallow depths indicating minor amounts of soil may have been cut from the uphill side of the property and pushed to the downhill side to level the lot prior to or at development.

There are no monitoring wells on the property. Some shallow lenses of groundwater were observed at an approximate depth of 12' below grade surface (bgs) and did not appear to be continuous on the property. The groundwater aquifer is approximately 40' or more bgs based on monitoring wells located approximately 0.2 mile south (upgradient). The presumed groundwater flow direction is to the north and east. The property is approximately 3,000 feet upgradient from the Duwamish Waterway.

The Site addressed in this voluntary cleanup action includes 3 areas on the property:

- heating oil/used oil USTs
- former fuel UST area
- hydraulic joist/sumps/drain in the service bays.

The approximate boundary of the Site is shown on the attached map.

CHARACTERIZATION OF CONTAMINATION

In the Phase I study, the status of the former fuel USTs was not known but the presumed location was identified based on historical photos. A geophysical survey of the property conducted in 2008 did not find evidence that the former fuel USTs remain, but did find concrete footings assumed to be from the fuel service islands. The location of the service islands was confirmed with aerial photographs.

During the geophysical survey, 2 small USTs referred to as the heating oil/used oil USTs, each being approximately 4' in diameter were identified near the northwest corner of the building.

Two underground hydraulic hoists and a filled floor sump were observed in the northern two lube bays of the building.

January 2008 confirmational sampling was conducted to identify location and characterize extent of contamination.

- Gasoline- (GRO) and diesel-range hydrocarbons (DRO) and benzene, toluene, ethylbenzene and xylene (BTEX) were not detected in groundwater samples collected from soil borings in and near the former fuel USTs.
- Soil was observed to be contaminated with gasoline-range hydrocarbons exceeding MTCA Method A cleanup levels.
 - In the area of the former fuel USTs contaminated soils were observed at a depth of 5' to no deeper than 12' bgs. Samples collected from the same borings at depths deeper than 12' to a max depth of 21 – 23' did not detect gasoline-range hydrocarbons.
 - In the area of the hoist and sump, contaminated soils were observed above MTCA Method A cleanup level.

Gasoline- and diesel-range hydrocarbons were not detected in groundwater samples collected from borings.

Summary of Hazardous Substances Observed at Site above MTCA Method A Cleanup Levels

Area	Hazardous substance above MTCA Method A Cleanup level prior to remediation
Former fuel USTs	GRO, ethylbenzene, xylene
heating oil/used oil USTs	Substances not observed above MTCA
hydraulic joist/sumps/drain in the service bays	GRO and DRO

Soil or groundwater contamination above MTCA Method A cleanup levels was not observed in the vicinity of the 2 above ground storage tanks (AST) that remain on the property.

REMEDIAL ACTION/PERFORMANCE SAMPLING

Heating oil/used oil USTs - The two 500-gallon USTs were removed from a single excavation (12/20/08). The tanks exhibited some corrosion but were in moderate to good condition with no visible holes. Contaminated soil was removed from the excavation area to a depth of less than 8' bgs. Excavation continued until vertical and lateral limits of contamination were reached based on field screening methods. DRO ranged from less than 25 mg/Kg to 37 mg/Kg and heating oil ranged from less than 50 mg/Kg to 140 mg/Kg at the maximum limits of soil excavation. 1,2-dichloroethane was detected in one sample at 0.022 mg/Kg which is below the MTCA Method B carcinogenic cleanup level. Approximately 30 tons of contaminated soil were removed from the excavation and transported to the Roosevelt Regional Landfill for disposal.

Former fuel USTs Area - December 2008, the area of the former fuel storage USTs was excavated to remove contaminated soil. Approximately 100 yd³ of non-contaminated soil was removed from grade to approximately 6' bgs. Approximately 200 yd³ of soil was excavated from 6' bgs to approximately 14' bgs and was transferred to the Roosevelt Regional Landfill for disposal. Excavation of contaminated soils continued until field screening indicated the limits of contamination had been reached. Ten discrete soil samples were collected from the final limits of the excavation. Samples were analyzed for GRO and BTEX. 4 samples were also analyzed for DRO and heavy oil (HO) based on GRO testing that indicated DRO and HO were possibly present. 2 samples were also tested for MTBE and lead. All analytical results for the soil samples in this area were below MTCA Method A cleanup levels. GRO ranged from below 3 mg/Kg to 15 mg/Kg; BTEX was below detection limits; DRO ranged from below 25 mg/Kg to 140 mg/Kg; heating oil ranged from less than 50 mg/Kg to 290 mg/Kg; MTBE and lead were below analytical detection limits.

Service Bays - The hydraulic hoist and floor drain/sump in the northern service bay were removed in December 2008. Contaminated soil was observed to extend from the base of the drain/sump to a depth of 10 - 12' bgs. Excavation continued to a depth of approximately 12 - 12.5' bgs where field screening indicated the limits of contamination had been reached. Approximately 58 tons of soil were removed from the excavation area and disposed of at Roosevelt Regional Landfill. Seven discrete soil samples were collected from the excavation area and analyzed for GRO, DRO, and HO. Three samples, with significant concentrations of GRO, were also analyzed for BTEX. One sample was also tested for metals. Except for the sample designated BEX-2-8.0 (collected from the west wall), all samples were below MTCA Method A cleanup levels. Analytical results from BEX-2-8.0 indicated Benzene was 0.03 mg/Kg and GRO was 64 mg/Kg. An additional 5 yd³ of soil was excavated from this area and disposed of at the Roosevelt Regional Landfill. A new performance sample (BEX-8-8.0) was collected from this location and analyzed for BTEX, GRO, DRO, and HO. Only GRO was detected at 4 mg/Kg.

The hoist/sump/drain in the second service bay from the north was not removed. An excavation pit was dug, from the exposed side of the sump that remained, northward connecting to the

excavation pit from the removed hoist/sump/drain. Two soil samples were collected from beneath the base of the sump and at a depth equivalent to the base of the hoist. Samples were analyzed for GRO, DRO, and HO, and the sample beneath the sump was analyzed for chlorinated volatile organics. DRO, HO, and chlorinated volatile organics were not detected at concentrations exceeding the laboratory lower reporting limits. Only GRO was detected at 3 and 4 mg/KG (below the MTCA Method A cleanup level).

Summary of MTCA Cleanup Levels for Soil at Site
(MTCA Cleanup Regulation, Chapter 173-340 WAC, Publication No. 94-06
Revised November 2007)

	GRO	DRO	HO	Benzene	Toluene	ethylbenzene	xylene	1,2-dichloroethane
Soil (mg/Kg)	30	2,000	2,000	0.03	7	6	9	11

Approximate Boundary of Site NW 2113

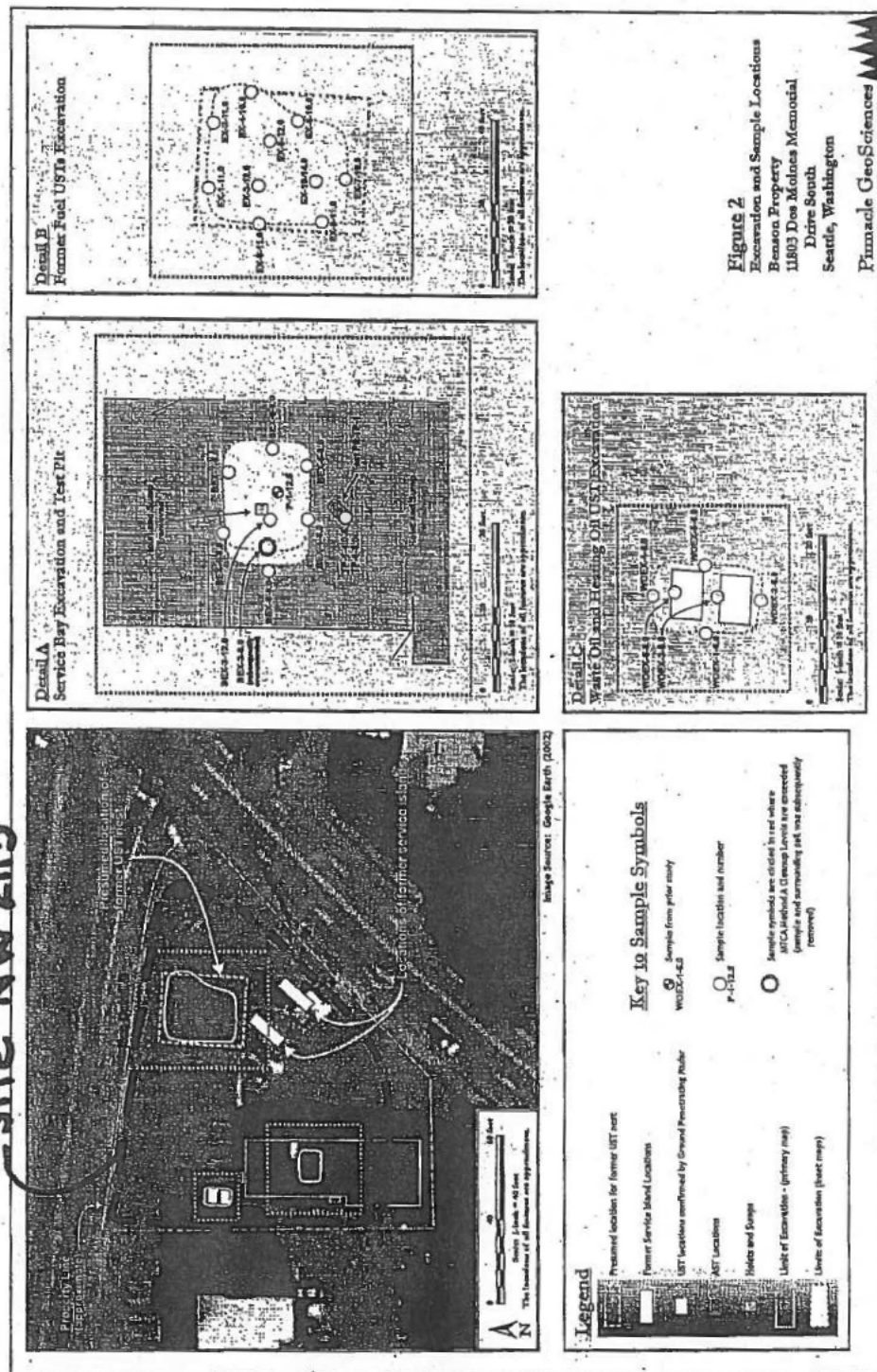


Figure 2
Excavation and Sample Locations
Benson Property
11803 Dos Molnos Memorial
Drive South
Seattle, Washington
Pinnacle GeoSciences